UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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IN RE CHRISTIE'S DATA BREACH LITIGATION,

No. 24-CV-4221 (JMF)

This Document Relates To: All Member Cases

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY ALL DEADLINES

Plaintiffs Efstathios Maroulis, William Colley, Russell DeJulio, Alice Bruce, and Ildar Gaifullin ("Plaintiffs") and Defendant Christie's Inc. ("Defendant," together with Plaintiffs, the "Parties") jointly notice the Court that they have reached an agreement to settle the action in its entirety. The Parties have mediated and reached an agreement in principle as to the material terms of a classwide settlement. The Parties intend to file a comprehensive Settlement Agreement along with Plaintiffs' Motion for Preliminary Approval by December 13, 2024 (within 30 days of today).

In light of the settlement, the Parties respectfully move the Court for an order staying all deadlines pending the filing of the Motion for Preliminary Approval and thereafter a Motion for Final Approval of the settlement. The Parties further move the Court for an order denying without prejudice (and with leave to refile) Defendant's pending Motion to Dismiss the First Amended Consolidated Class Action Complaint (ECF 44).

Dated: November 15, 2024 Respectfully submitted,

/s/ David K. Lietz

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via email via the CM/ECF system on all counsel of record on this 15th day of November, 2024.

/s/David K. Lietz
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